

APPENDIX A: Shoreline Substantial Development Permit and Special Use Permit Review/Analysis:

City of Carnation Shoreline Master Program

General Policies and Regulations:

A. Requirements for all shoreline uses, activities, and developments:

Applicable Review Policies:

P1: The City should encourage those uses, activities and developments that preserve the natural amenities of the shorelines and provide public access to them.

P5: All shoreline uses, activities and developments, should conform to the policies and regulations of the Shoreline Management Act, this Program, Carnation's Land Use Code, the Comprehensive Plan, and all other municipal provisions and planning initiatives. This includes those uses, activities and developments that do not require a Shoreline Substantial Development Permit (SSDP).

P6: Each development's purpose, overall density, lot coverage, and dimensions should be consistent with the public interest, the physical capabilities of the site, adjacent uses, and the subject property's environmental designation.

P7: All uses, activities, and developments permitted in the shorelines should be functionally and aesthetically compatible with, should not cause unmitigated adverse impacts to adjacent uses and environments, and should not result in a net loss of shoreline ecological functions.

P8: All shoreline uses, activities, and developments should preserve the integrity and characteristics of their surrounding environment, consistent with the goals and regulations of this Master Program.

P11: All development should be located and designed to minimize flood damage, erosion, increased surface runoff, degradation of water quality and other adverse environmental impacts.

P12: All development should be located and designed to prevent the need for shoreline stabilization measures and flood protection works. Development that would require such activity should be prohibited.

Applicable Review Regulations:

R2: All shoreline uses, activities and developments shall conform to the policies and regulations of this Program, Carnation's Land Use Code, the Comprehensive Plan, and all other municipal provisions and planning initiatives. This includes those uses, activities and developments that do not require a SSDP.

R3: Through the application of the Master Program to shoreline uses, activities and modifications, the City shall apply a performance standard of no net loss of shoreline ecological function.

R4: Development shall only be permitted where adequate provisions for utilities, circulation and access have been made.

R9: The known characteristics, locations, and boundaries of the following areas and sites shall be recorded upon the face of any shoreline plat or short plat:

- (a) Critical areas
- (b) Flood zones
- (c) Archaeological, cultural and historic sites, unless the information is considered to be sensitive and confidential by the State or City
- (d) Shoreline buffers and setbacks
- (e) Permit conditions
- (f) Access and open space easements

Landowners shall file these notations with the King County Assessor's Office at the time of any plat approval or prior to the sale of any lot within the platted property.

Findings: Portions of the development are located within the Shoreline jurisdiction which includes the Tolt River 100-year floodplain boundary and is located within the High Intensity Environmental Designation.

While no homes will be constructed within the shoreline jurisdiction, the following elements will:

- A buried wet vault water quality facility for the westerly detention pond on the western portion of Tract H.
- An emergency overflow will be located just south of the wet vault extending from the detention pond to a conveyance system in the SR 203 right-of-way.
- A 2,500 square foot area where proposed Road A intersects with SR203. Connection of Road A and C to SR 203.
- Frontage improvements along the east side of SR 203, including curb, gutter, and storm drainage system.
- A 12' wide pervious pavement pedestrian walkway/shared use path and a 12' by 40' pedestrian bridge at the western edge of the existing detention pond to be abandoned.
- Mitigation plantings for critical areas and associated buffer impacts from the above components.

There is a separate parcel owned by King County between the subject property and the Ordinary High Water Mark (OHWM) of the Tolt River. The three ponds in the south portion of the subject property in Tract K will be abandoned and new detention facilities will be constructed in Tracts H and M. The applicant is working with King County to convey Tract K for to the county for diking improvements and development of a trail on the dike.

There are limited portions on the west perimeter of the site that are within the FEMA mapped 100-year floodplain of the Tolt River. Much of the site has been removed from the 100-year floodplain through FEMA's Letter of Map Revision – Fill (LOMR-F) process. All residential units

will be designed to be outside of the 100-year floodplain. All floodplain, shoreline, and other critical area information shall be shown on the face of the final plat.

The application included a Habitat Management Plan and Critical Areas Report. In these reports, there is indication that no net loss will be achieved by the creation of Tracts J and K and by the abandonment of the three existing drainage ponds, and pursuant to project conditions, reports will be updated.

The property is within the City of Carnation Urban Growth Area and will therefore be served by water, sewer, and other utilities. There will be adequate circulation provided by new interior roads and two access points to State Route 203.

B. Archaeological, Cultural, and Historic Resources

Applicable Review Regulations:

R14: All shoreline permits shall contain provisions which require developers to immediately stop work and notify the City, DAHP, and potentially affected tribes if any phenomena of potential archaeological interest are uncovered during excavations. In such cases, the developer shall be required to provide for a site inspection and evaluation by a professional archaeologist to ensure that all possible valuable archaeological data are properly salvaged.

R15: During construction, the applicants and/or any contractor(s) or agents performing construction or site development work shall immediately cease operation and notify the City upon discovery/disturbance of any cultural resources or archaeological materials. The City will refer the owner to the appropriate state or federal agency and/or tribal authority for direction. Compliance with any such direction, including without limitation any required site monitoring, shall be at the applicants' sole expense.

Findings: A Cultural Resources report is required prior to any site disturbing activities.

C. Environmental Impacts

Applicable Review Policies:

P20: Shoreline use and development within shoreline jurisdiction should be designed, constructed, managed, and operated in a manner that prevents or mitigates adverse impacts so that the resulting ecological condition is not degraded from the current condition. For each development, this means assuring no net loss of ecological functions and processes relative to the existing conditions throughout the City's shoreline jurisdiction, including upland and aquatic areas.

P22: Erosion and pollution should be prevented.

Applicable Review Regulations:

R21: Applicants shall apply the following sequence of steps in order of priority to avoid or minimize significant adverse effects and significant ecological impacts, with a. being top priority:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action;

- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation by using appropriate technology or by taking affirmative steps to avoid or reduce impacts;
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations;
- (e) Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and
- (f) Monitoring the impact and the compensation projects and taking appropriate corrective measures.

R22: When reasonably feasible options or alternatives exist concerning the choice, location, construction, and management of shoreline uses, activities and developments, proponents shall select the development option or alternative that least interferes with the natural shoreline characteristics, functions and processes. Such characteristics and processes include, but are not limited to, flood capacity, water circulation, sand and gravel movement, natural erosion and accretion.

R23: All project proposals, including those for which a Substantial Development Permit is not required, shall comply with Chapter 43.21C RCW, the Washington State Environmental Policy Act (SEPA) to the extent required by the City's SEPA regulations.

R26: When compensatory measures are appropriate pursuant to the mitigation in Regulation 21, preferential consideration shall be given to measures that replace the impact functions directly and in the immediate vicinity of the impact. However, alternative compensatory mitigation within the watershed that addresses limited factors or identified critical needs for shoreline resource conservation based on watershed or comprehensive resource management plans, including the Shoreline Restoration Plan, applicable to the area of impact may be authorized. Authorization of compensatory mitigation measures may require appropriate safeguards, terms or conditions as necessary to ensure no net loss of ecological functions.

R29: Grading, excavation, upland fill, and other earth modifications shall meet City development standards to avoid adverse impacts to adjacent properties or shoreline features.

R30: Erosion and pollution during both project construction and operation shall be prevented to the greatest extent possible through the use of all reasonably feasible methods and equipment, including, but not limited to, BMPs.

Findings: The Critical Areas Report provides detail regarding mitigation sequencing. The project layout is designed to avoid and minimize impacts to critical areas and buffers to the extent possible. The City requires frontage improvements along SR203, including the pedestrian trail and bridge to meet the Tolt Avenue Action Plan. The compensatory storage will result in unavoidable impacts to the CMZ buffer which will be compensated for with rehabilitation and enhancement of existing non-functional (developed) to low-functional degraded buffer.

The westerly portion of Tracts H and J is within the designated shoreline environment. Project components within the High Intensity shoreline environment designation include:

- A buried wet vault stormwater facility and portion of storm pond access road on the western portion of Tract H.
- Connections of Road A to SR203
- A 12' wide pervious pavement pedestrian walkway and a 12' by 40' pedestrian bridge spanning a culvert and the western edge of an artificial pond (Pond 1).

The above are permitted uses in the High Intensity shoreline environment designation. They would be located within the developed road right-of-way and adjacent maintained grass area. Ecological functions in this area include maintain water quality through stormwater infiltration and prevent erosion.

Additional stormwater runoff would occur in proportion to the total new impervious and cleared surfaces associated with the project. Discharge of this additional surface water would be collected and routed through water quality facilities designed to meet City standards. Small quantities of household and yard chemicals may be present in the runoff. The preliminary Stormwater Site Plan and Technical memorandums discuss drainage design and water quality measures.

D. Critical Areas

Critical areas are addressed in the Staff Report. The Shoreline regulations essentially mirror chapter 15.88 CMC and both are reviewed and addressed in the Applicant's Critical Areas Report and Conceptual Mitigation Plan, dated February 5, 2020. (Exhibit 17).

E. Flood Hazard Reduction

R31: Development in floodplains shall, consistent with applicable flood hazard plans and regulations, avoid significantly or cumulatively increasing flood hazards. Development shall be consistent with this SMP, as well as guidelines of the Natural Resource Conservation Service, the U.S. Army Corps of Engineers, and King County's flood hazard management plan.

R40: Roads or railroads shall be built outside the floodway except for necessary crossings. New transportation facilities shall be designed so that no significant loss of floodway capacity or measurable increase in predictable flood levels will result based on studies submitted by applicants and approved by the responsible local government. If proposed transportation facilities are intended to secondarily provide flood control, they shall comply with policies and regulations in this section.

Findings: On December 6, 2001, the Federal Emergency Management Agency (FEMA) adopted a revised Flood Insurance Study (FIS) and Flood Insurance Rate Maps (FIRM) which determined that the majority of the homes within the Carnation city limits were within a 100-year floodplain. Based on the concerns of the city of Carnation regarding the AO-zone designation, the FEMA Regional Engineer conducted an analysis of the hydraulic and hydrologic data from the flood study. The results of the re-analysis showed that flood depths in most areas of the then-identified AO-Zone would be just below the one-foot flood depth threshold established by FEMA policy as warranting an X-Zone designation. Therefore, given the lack of one-foot flood depth throughout the entire AO-Zone area, the FEMA Regional Engineer's Office determined that the entire AO-Zone designation for the City of Carnation could be

removed. On May 1, 2002, FEMA issued Letter of Map Revision (LOMR) 02-10-336P to modify the zone designation from Zone AO (Depth 1) to Zone Shaded X (500-year floodplain). There is no Zone AO within Carnation City limits.

On September 20, 2007, FEMA issued a Preliminary FIS and FIRM which included the map revisions made by LOMR) 02-10-336P. There was public notification and open house(s) held during this time to alert the public as to the potential changes and insurance requirements for their properties. Although final approval of the 2007 Preliminary FIRM has been long delayed for reasons unrelated to the City of Carnation or Snoqualmie Valley, the City has given consideration to the 2007 maps in its land use policy making decisions and documents since that time. On February 24, 2020, the City received notice from FEMA that the 2007 FIRM was considered final and will become effective on August 19, 2020. FEMA did not have another public process, as it was performed during 2007. Carnation's City Council was involved at that time.

MainVue is not developing within the floodway and there are only small areas of floodplain scattered around the plat, mostly in the yards of some of the lots near the fire station. No structures are proposed within the floodplain. Much of the development is completely outside of the floodplain. Any structures that may be built within the floodplain would need to follow CMC 15.64 – the version in effect at the time of building permit submittal. The plat was vested under 2001 FIRMs, and they have incorporated all of the LOMCs done since that time on the face of the preliminary plat map. With the updated 2007 maps, FEMA has removed all Zone AO from City limits. The Zone AO that was previously on MainVue property will shift to Shaded X Zone once the updated maps are adopted. There is no change in location of the floodplain on the MainVue site from 2001 to 2007, and there are approved LOMCs that were incorporated and still apply. All building permits applied for after the August 19, 2020 effective date, must comply with the updated regulations.

All proposed public rights-of-way are outside the floodplain and the 100' CMZ buffer except for two intersections at Tolt Avenue. Sewer and water installations are proposed within the right-of-way. Dry utilities will be placed in an easement contiguous and parallel to the right-of-way. All utilities will be designed to be above the 100' CMZ buffer.

There are no electrical connections to the sewer valve pits, they are designed to operate under water. Each valve pit is fitted with an anti-buoyancy ring.

F. Public Access

Shoreline public access refers to the public's physical ability to reach and touch the water's edge and its ability to view the water and shoreline. Public access for the purpose of this section may include, but is not limited to, view corridors, public pathways and trails (including those that accommodate the disabled), bridges, street ends, picnic areas, boat launches, and recreational easements.

Findings: The plat has been designed so that the southernmost lands, closest to the river, although not directly adjacent to the river are in Tract K. Tract K is planned to be sold and conveyed to King County for use by the County in its Lower Frew Levee setback project. Public access across Tract K may be provided by the County at a later date.

G. Shoreline Vegetation Conservation

Applicable Review Policies:

P47: All clearing activities should be designed and conducted to minimize stream and wetland sedimentation, impacts to wildlife habitat, and degradation of water quality.

P48: All clearing activities should be limited to the minimum reasonably necessary to accommodate a specific permitted shoreline development. Such activities should be discouraged within the buffers this Program designates from the ordinary high water mark.

P50: Disturbed buffer areas, dedicated open space, and areas not directly employed under a permitted use should be promptly restored with native vegetation after clearing and construction is completed.

Findings: There will be tree retention in the lower existing pond area closer to the Tolt River in Tract D. Additional landscaping in Tracts A, C, D, G, J, and L will create additional potential habitat. The Floodplain Habitat Assessment, prepared by Essency Environmental, states that this project will result in no net loss of floodplain storage and will have no in-water components. It is unlikely to adversely impact any fish species.

I. Water Quality

Applicable Review Policies:

P68: All stormwater runoff should be treated on-site to prevent adverse impacts to off-site waterbodies.

P70: Storm drainage facilities should be separated from sewage disposal systems.

Findings: The stormwater system is designed for treatment on-site and to be separated from sewage disposal systems. See section III of the staff report for all stormwater related conditions of approval.

Shoreline master program jurisdiction and environment designation policies and regulations

F. High Intensity Environment

Applicable Review Policies:

P79: Full utilization of existing urban areas should be achieved before further expansion of intensive development is allowed. Reasonable long-range projections of regional economic need should guide the amount of shoreline designated High Intensity.

P80: Policies and regulations shall assure no net loss of shoreline ecological functions as a result of new development. Where applicable, new development shall include environmental cleanup and restoration of the shoreline to comply with any relevant state and federal law.

Applicable Review Regulations:

R126: Assign a High Intensity environment designation to shoreline areas within incorporated municipalities and urban growth areas if they currently support high-intensity uses related to commerce, transportation, or navigation, or are suitable and planned for high-intensity water-oriented uses.

Findings: The subject properties are located within the City's Urban Growth Area and are designated High Density Residential. They also have a shoreline environmental designation of High Intensity.

J. Permitted Uses and Development Standards

Applicable Review Regulations:

R132: Table IV-1 indicates which shoreline activities, uses, developments and modifications may be allowed or are prohibited in shoreline jurisdiction within each shoreline environment designation. Activities, uses, developments, and modifications identified as "Permitted Uses" require a Shoreline Substantial Development Permit, or a Shoreline Exemption, and those identified as "Conditional Uses" require a Shoreline Conditional Use Permit per SMP Section VII, Shoreline Permits, Procedures, and Administration. Activities, uses, developments, and modifications identified as "Prohibited" are not allowed.

R138: To preserve the existing and planned character of the shoreline consistent with the purposes of the shoreline environment designations, development standards are provided in Table IV-2 and IV-3. In addition, shoreline developments shall comply with all other dimensional requirements of the Carnation municipal code.

Findings: Residential use is permitted outright in the High Intensity shoreline environment designation.

The smallest proposed lot width for single-family residential is 40' which exceeds the 25' minimum requirement. The smallest single-family residential lot area is 3,740 square feet which exceeds the require 1,800 square feet minimum in the shoreline code. The proposed plat meets or exceeds the standards for the High Intensity shoreline environment designation as shown in Table IV-2.

Shoreline Use Policies and Regulations:

E. Residential Development

Applicable Review Policies:

P127: Residential development should be identified as a priority use only when developed in a manner consistent with the control of pollution and prevention of damage to the natural environment.

P128: Residential development should be located and constructed in a manner that assures no net loss of shoreline ecological functions.

P129: Residential development should provide for outdoor recreation, protect natural features, preserve views and minimize use conflicts through the use of lot dimensions, setbacks, shoreline buffers, and open space between structures.

P130: Residential development should be designed to preserve existing shoreline vegetation, control erosion, protect water quality, and enhance shoreline aesthetic characteristics, views, and normal public use of the shoreline.

P131: New residential development, including accessory uses and structures, should be sufficiently set back from steep slopes, channel migration zones, and eroding shorelines so that structural improvements are not necessary.

P132: New residential development should be located and designed so as to prevent the creation of new residential lots that will require shoreline stabilization or deviation from vegetation management and water quality standards.

Applicable Review Regulations:

R188: The following residential and residentially-related uses and activities are permitted subject to the appropriate regulations of this program:

- (a) Single-family and multifamily units when allowed consistent with the Carnation Land Use Code.
- (b) Private non-commercial conservatories and greenhouses
- (c) Operation of fixed, electrically-powered mechanical equipment to provide utilities service to a private building site
- (d) Non-commercial private off-street parking and garages
- (e) Non-commercial family recreational areas
- (f) Non-commercial kennels, stables and pastures (subject to regulations presented in SMP Section V.A)
- (g) Small-scale agricultural activities for immediate personal or family subsistence or enjoyment (subject to regulations within SMP Section V.A.)
- (h) Accessory buildings

R189: Single family residential development is a preferred use when it is developed in a manner consistent with control of pollution and prevention of damage to the natural environment.

R190: Residential development shall be located and constructed to result in no net loss of shoreline ecological function. No net loss of shoreline ecological functions shall be assured through application of shoreline buffers specified in SMP Section III.G., Shoreline Vegetation Conservation and Appendix A. Critical Areas regulations to avoid future stabilization, buffers, density, shoreline stabilization, and on-site sewage disposal.

R196: All primary residential structures, and garages and driveways, shall be set back consistent with the shoreline buffer and critical area regulations of this Program established in Section III.G, Shoreline Vegetation Conservation and Appendix A, Critical Areas Regulations and consistent with the Land Use Code.

R199: Those appurtenances, accessory uses, and facilities which service a residential structure but do not enhance the enjoyment of the shoreline (such as driveways, garages, parking areas)

shall be located landward of the residential structure. Those which do enhance enjoyment of the shoreline (such as pools, decks, and other hobby or recreational structures) may be located next to or waterward of the residential structure.

R200: New multi-unit residential development, including duplexes, fourplexes, and the subdivision of land into five or more lots shall make adequate provisions for public access consistent with the regulations set forth in SMP Section III.F.

R201: All new residential development shall be required to meet the vegetation management provisions contained in Section III.G, Shoreline Vegetation Conservation.

Findings: Portions of the development are located within the Shoreline jurisdiction which includes the Tolt River 100-year floodplain boundary and is located within the High Intensity Environmental Designation.

While no homes will be constructed within the shoreline jurisdiction, the following elements will:

- A buried wet vault water quality facility for the westerly detention pond on the western portion of Tract H.
- An emergency overflow will be located just south of the wet vault extending from the detention pond to a conveyance system in the SR 203 right-of-way.
- A 2,500 square foot area where proposed Road A intersects with SR203. Connection of Road A and C to SR 203.
- Frontage improvements along the east side of SR 203, including curb, gutter, and storm drainage system.
- A 12' wide pervious pavement pedestrian walkway/shared use path and a 12' by 40' pedestrian bridge at the western edge of the existing detention pond to be abandoned.
- Mitigation plantings for critical areas and associated buffer impacts from the above components.

There is a separate parcel owned by King County between the subject property and the Ordinary High Water Mark (OHWM) of the Tolt River. The three ponds in the south portion of the subject property in Tract K will be abandoned and new detention facilities will be constructed in Tracts H and M. The applicant is working with King County to convey Tract K for to the county for diking improvements and development of a trail on the dike.

There are limited portions on the west perimeter of the site that are within the FEMA mapped 100-year floodplain of the Tolt River. Much of the site has been removed from the 100-year floodplain through FEMA's Letter of Map Revision – Fill (LOMR-F) process. All residential units will be designed to be outside of the 100-year floodplain. All floodplain, shoreline, and other critical area information shall be shown on the face of the final plat.

The application included a Habitat Management Plan and Critical Areas Report. In these reports, there is indication that no net loss will be achieved by the creation of Tracts J and K and by the abandonment of the three existing drainage ponds, and pursuant to project conditions, reports will be updated.

The property is within the City of Carnation Urban Growth Area and will therefore be served by water, sewer, and other utilities. There will be adequate circulation provided by new interior roads and two access points to State Route 203.

Administration and Enforcement

B. Shoreline Permits, procedures, and administration

Generally, the City Planner or his/her designee shall serve as the SMP Administrator and grant or deny applications for Shoreline Substantial Development Permits. In this case, the applicant has requested all permits be concurrently reviewed and decided upon by the Hearing Examiner.

G. Application requirements

A complete application for a Shoreline Substantial Development permit was submitted concurrently with the Preliminary Plat permit and Special Use permit. See Master Application, Exhibit 1, and Shoreline Substantial Development applicant analysis, Exhibit 3.

N. Initiation of development

R392: Each permit for a Shoreline Substantial Development, Shoreline Conditional Use, or Shoreline Variance issued by the City shall contain a provision that construction pursuant to the permit shall not begin and is not authorized until twenty-one (21) days from the date of receipt with Ecology as defined in RCW 90.58.140(6) and WAC 173-27-130, or until all review proceedings initiated within twenty-one (21) days from the date of receipt of the decision, except as provided in RCW 90.58.140(5)(a) and (b). The date of receipt for a Shoreline Substantial Development Permit means that date the applicant receives written notice from Ecology that it has received the decision.

Chapter 15.18 – Land Use Approvals

Part I – Special Use and Conditional Use Permits

A Special Use permit is required in conjunction with a Shoreline Substantial Development permit. All required materials for a Special Use permit have been submitted as part of the land use and shoreline substantial development permits.

Section 15.18.040 – Criteria for approval of special use and conditional use permits

- A. A conditional use permit shall be granted by the hearing examiner, and a special use permit shall be granted by the city planner, if each of the following criteria are satisfied:
 - 1. The proposed use is consistent with the city of Carnation comprehensive plan and the CMC;
 - 2. The proposed use is designed and constructed, and will be operated and maintained, in a manner that is compatible with the existing or intended character, appearance, quality of development and physical characteristics of both the subject property and the surrounding vicinity;
 - 3. The location, size, and height of buildings, structures, walls, fences, and screening vegetation for the conditional or special use will not hinder

- neighborhood circulation or discourage the permitted development or use of neighboring properties;
4. The type, hours of operation, and appropriateness of the proposed use in relation to adjacent uses will not create unusual hazards or result in adverse impacts; and
 5. The proposed use will be served by adequate public facilities and services and will not adversely affect public services to the surrounding area in a manner and/or to a degree that cannot be sufficiently mitigated through the imposition of reasonable conditions of approval.
- B. In granting a special or conditional use permit, the permit-issuing authority may attach to the permit such reasonable conditions as will ensure that the development in its proposed location will satisfy the criteria established in subsection A of this section or otherwise mitigate any adverse impacts of the proposed use.
 - C. The permit-issuing authority may attach to a permit a condition limiting the permit to a specified duration.
 - D. All conditions or requirements of approval shall be entered on the face of the permit.
 - E. All conditions or requirements of approval authorized by this section are enforceable in the same manner and to the same extent as any other applicable requirement of this title.

Finding: The applicant requested the Special Use permit be reviewed concurrently with the Shoreline Substantial Development permit and the Preliminary Plat approval. Therefore, all three applications will be reviewed by the hearing examiner during the open record public hearing. As the Special Use permit (SUP) is required in conjunction with the Shoreline Substantial Development permit (SSD), analysis and conditions required for the SSD will apply equally to the SUP.

As reviewed in the staff report, Tolt River Terrace is consistent with the City's Comprehensive Plan and is either consistent with or can be conditioned to be consistent with the zoning, and development standards applicable to the project site. The project is designed in a manner that is compatible with the existing or intended character, appearance, quality of development and physical characteristics of both the subject property and the surrounding vicinity. The project is designed to protect the shoreline of the Tolt River by locating the lands closest to the river in proposed Tract K, which is planned to be sold and conveyed to King County for the levee setback project.

No buildings are planned for the lands on the project site within the Shoreline jurisdiction. However, planned locations, sizes, and heights of new homes planned for the subdivision as well as potential retaining walls and fences do not hinder neighborhood circulation or discourage the permitted development or use of neighboring properties. As detailed elsewhere in the Staff Report, the project is designed and required to meet the City's extensive design guidelines, and neighboring properties are already developed with the fire station, the middle school, and the Snoqualmie Valley Trail, or will be later developed with the County's Lower Frew levee setback project.

The type, hours of operation, and appropriateness of the proposed use in relation to adjacent uses will not create unusual hazards or result in adverse impacts. The project site lands located in the Shoreline jurisdiction include areas for minor improvements and mitigation

associated with the plat, including a buried wet vault, an emergency overflow from a stormwater facility, frontage and road improvements, and mitigation plantings for critical areas and associated buffer impacts. None of these improvements create unusual hazards or result in unmitigated adverse impacts. In addition, the plat is designed so that Tract K can be sold and conveyed to the County for use in the Lower Frew levee setback project, which benefits the shoreline.

The proposed subdivision will be served by adequate public facilities and services and will not adversely affect public services to the surrounding area in a manner and/or to a degree that cannot be sufficiently mitigated through the imposition of reasonable conditions of approval. Those portions of the project actually within the shoreline jurisdiction should not require public facilities and services.

All applicable conditions of approval are listed in Section III of the staff report. City staff recommends the Shoreline Substantial Development Permit and the Special Use Permit be approved.